UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA DISTRICT OF PITTSBURGH

IN RE: Renee R. Kline, CASE NO.: 20-20081-JAD
Debtors. Chapter 13

RESPONSE TO INTERIM NOTICE OF CURE OF ARREARS

(Docket No. 73)

NOW INTO COURT, through undersigned counsel, comes secured creditor, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust ("Secured Creditor"), and files its response to the Interim Notice of Cure of Arrears (Docket No. 73), and in support thereof, represents the following:

- 1. Secured Creditor agrees the Trustee has disbursed pre-petition arrears.
- 2. Secured Creditor disagrees the Debtor is current post-petition. Account is due for 05/01/2024 with a post-petition payment of \$493.04 minus a suspense balance of \$122.86 with \$370.18 due. Please note, Secured Creditor is not in receipt of check #1299480 in the amount of \$493.04 dated 04/25/2024. Once received the funds will be applied to the account.
- 3. Secured Creditor reserves the right to amend its Response to the Interim Notice of Cure of Arrears.

DATED: May 3, 2024 Respectfully submitted by,

/s/ Michelle L. McGowan

Michelle McGowan, Esq.

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

13010 Morris Rd., Suite 450, Alpharetta, GA 30004

Attorney for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust

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/	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 3, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Renee R. Kline 2109 Victoria Avenue Arnold, PA 15068

And via electronic mail to:

Rodney D. Shepherd River Park Commons 2403 Sidney Street, Suite 208 Pittsburgh, PA 15203

Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219

Office of the United States Trustee 1000 Liberty Avenue Suite 1316 Pittsburgh, PA 15222

> By: /s/ Justine Bennett Justine Bennett

Email: Jusbennett@raslg.com

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PAYME	NT HISTORY	PER MSP				CURRENT TOTALS			
	LOAN NUMBE						POST-PE		
	FILING DATI		PAYMENT CHANGES					Pre Pmts Post Pmts Susp Bal	
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FIRST PO	ST-PETITION		AMOUNT	\$ 457.71	\$ 530.62		\$493.04		
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	PRE- PETITION	POST- PETITION	PAYMENT	Phonepay	MANUAL	MANUAL	MANUAL		
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3/26/2020				\$ -	\$ -	\$ -			
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